

Of Counsel:

ALSTON HUNT FLOYD & ING

Attorneys At Law

A Law Corporation

PAUL ALSTON 1126-0

BRUCE H. WAKUZAWA 4312-0

GLENN T. MELCHINGER 7135-0

JASON H. KIM 7128-0

American Savings Bank Tower

1001 Bishop Street, 18th Floor

Honolulu, Hawai'i 96813

Telephone: (808) 524-1800

Facsimile: (808) 524-4591

Email: palston@ahfi.com

bwakuzawa@ahfi.com

gmelchinger@ahfi.com

jkim@ahfi.com

Attorneys for Plaintiffs

and Third-Party Defendants

the Sports Shinko Companies

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI'I

SPORTS SHINKO CO., LTD.,) CV 04-00124 BMK

) CV 04-00127 BMK

Plaintiff,)

) CONSOLIDATED CASES

vs.)

) **PLAINTIFFS' MOTION**

QK HOTEL, LLC, et al.,)

) **FOR PARTIAL SUMMARY**

) **JUDGMENT ON THE ISSUE**

Defendants,)

) **OF THE KINOSHITAS'**

and)	INTENT TO HINDER, DELAY, OR DEFRAUD; MEMORANDUM IN SUPPORT OF MOTION; CERTIFICATE OF SERVICE
)	
FRANKLIN K. MUKAI, et al.,)	
)	
Third-Party Plaintiffs,)	
)	
vs.)	
)	
SPORTS SHINKO (USA) CO.,)	
LTD., et al.,)	
)	
Third-Party)	
Defendants,)	
)	
and)	
)	
SPORTS SHINKO (HAWAII) CO.,)	
LTD., et al.,)	
)	
Third-Party Defendants/ Counterclaimants,)	
)	
vs.)	
)	
QK HOTEL, LLC, et al.,)	
)	
Third-Party Counterclaim Defendants.)	
)	
AND CONSOLIDATED CASES)	
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**PLAINTIFFS' MOTION FOR PARTIAL SUMMARY
JUDGMENT ON THE ISSUE OF THE KINOSHITAS'
INTENT TO HINDER, DELAY, OR DEFRAUD**

Plaintiff Sports Shinko Co., Ltd. ("SSJ") hereby moves this Court to enter partial summary judgment in its favor on the issue of Toshio Kinoshita's ("Toshio's") and Satoshi Kinoshita's ("Satoshi's") intent to hinder, delay, or defraud creditors in violation of Haw. Rev. Stat. § 651C-4(a)(1).

This Motion is based upon the memorandum in support, the declarations and exhibits attached to the Concise Statement of Fact submitted herewith, and the records and files herein.

DATED: Honolulu, Hawai'i, December 19, 2007.

/s/ Glenn T. Melchinger
PAUL ALSTON
BRUCE H. WAKUZAWA
GLENN T. MELCHINGER
JASON H. KIM

Attorneys for Plaintiffs and
Third-Party Defendants the
SS Companies